



ATC COMMUNICATIONS

225 West North Street • P.O. Box 98 • Albion, Idaho 83311
Telephone: (208) 673-5335 • Fax: (208) 673-6200 e-mail: atc@albiontel.com

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February 21, 2008

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VIA UPS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Albion Telephone Company Inc.
CPNI Certification – EB Docket No. 06-36

Dear Ms. Dortch,

Albion Telephone Company, Inc. respectfully submits its CPNI Certification for the calendar year 2007.

If there are any questions regarding this submission, please contact me at (208) 672-5335.

Regards,

Robert Kraut
Controller

Enclosure

c: FCC, Enforcement Bureau, Telecommunications Consumers Division, 445 12th Street, (2 copies via UPS), Best Copy and Printing, Inc. (1 copy via facsimile 202/488-5563)

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 8, 2008

Name of company covered by this certification: Albion Telephone Company, Inc.

Form 499 Filer ID: 805926

Name of signatory: Rich Redman

Title of signatory: Vice President

I, Rich Redman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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STATEMENT

Albion Telephone Company, Inc. ("Albion Telephone") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Albion Telephone has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Albion Telephone continually educates and trains its employees regarding the appropriate use of CPNI. Albion Telephone has established disciplinary procedures should an employee violate the CPNI procedures established by Albion Telephone
- Albion Telephone maintains a record of its and its affiliates sales and marketing campaigns that use customers' CPNI. Albion Telephone also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- Albion Telephone has established a supervisory review process regarding compliance with the CPNI rules with respect outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, ATC Long Distance, Inc's sales personnel obtain supervisory approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Albion Telephone took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Albion Telephone at a state commission, in the court system, or at the Federal Communications Commission: There were no data broker instances in 2007.
- The following is information Albion Telephone has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: ATC Long Distance used a variety of methods to authenticate customers prior to disclosing CPNI and established passwords for use when discussing Call Detail Records with the customer of record. Albion Telephone does not use CPNI for marketing purposes.



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- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
 - ✓ Number of customer complaints Albion Telephone received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None
 - ✓ Category of complaint:
 - 0 Number of instances of improper access by employees
 - 0 Number of instances of improper disclosure to individuals not authorized to view the information.
 - 0 Number of instances of improper access to online information by individuals not authorized to view the information.
 - 0 Number of other instances of improper access or disclosure.
 - ✓ Description of instances of improper access or disclosure: N/A